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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

IMPLEMENTATION OF SECTION 17 OF THE)
CABLE TELEVISION CONSUMER PROTECTION)
AND COMPETITION ACT OF 1992)
)
COMPATIBILITY BETWEEN CABLE SYSTEMS)
AND CONSUMER ELECTRONICS EQUIPMENT)

ET Docket No. 93-7

REPLY COMMENTS OF
AMERICAN TELEPHONE AND TELEGRAPH COMPANY

American Telephone and Telegraph Company ("AT&T")
hereby replies to the comments submitted in response to the
Commission's Notice Of Inquiry ("NOI"), released January 29,
1993.¹

By this inquiry, the Commission seeks to obtain
information which will form the basis for a report to
Congress and subsequent rulemaking to implement the
provisions of Section 17 of the Cable Television Protection
and Competition Act of 1992.² Section 17 requires the
Commission to prescribe regulations to ensure compatibility
between consumer electronics equipment and cable systems so

¹ Implementation of Section 17 of the Cable Television
Consumer Protection and Competition Act of 1992,
Compatibility Between Cable Systems and Consumer
Electronics Equipment, ET Docket No. 93-7 (released
January 29, 1993).

² Cable Television Protection and Competition Act of 1992,
Pub. L. No. 102-385, 106 Stat. 1460 (1992), Section 17.

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that cable subscribers may enjoy the full benefit of both the programming available on cable systems and the functions available in televisions, video cassette recorders, and other consumer electronics equipment.³

The NOI (¶ 14) inquires about the impact of new digital transmission and compression technologies on the compatibility between cable systems and consumer equipment. The NOI asks whether new standards or operating requirements are necessary to accommodate the introduction of new digital technologies. Id. In addition, the NOI inquires whether the Commission should address changes in cable interfaces that may be required by digital technologies. Id., ¶ 17.

The comments submitted in response to the Commission's NOI agree that technological compatibility between consumer equipment and cable systems is an important issue facing the Commission and the industry. Absent standard interfaces, equipment will have to be designed specifically for each type of cable system.⁴

The comments differ, however, in their approach to the compatibility issue. The National Cable Television Association ("NCTA") encouraged the Commission to impose

³ NOI, ¶¶ 1-3.

⁴ Most comments support creation of a standard. See, e.g.,

"discipline" on the consumer electronics industry by strictly defining the requirements for "cable-ready" television receivers.⁵ The consumer electronics industry, through the EIA/CEG, suggested that the Commission consider a moratorium on deployment of digital technologies in cable systems until

So, too, has Congress recognized that "the ultimate solution of [the compatibility] issue requires cooperation between the cable industry and the consumer electronics industry."⁹

The cable industry and consumer electronics firms have already established an industry group to address the questions raised in this proceeding. That group has been meeting since January and filed comments in this proceeding. To ensure the effectiveness of this industry activity, the Commission should endorse the group's efforts, with the caveat that Commission action may be necessary if the industry cannot voluntarily implement effective interface standards.

In addition, the industry group should be expanded, as BellSouth advocates,¹⁰ to include representatives of other communications media. Examination of standardized interfaces for multimedia consumer electronics should explore interfaces which work for all media, not just for cable systems. An approach limited to cable services would require the Commission to face the compatibility question all over again with other broadband communications technologies such as satellite, ISDN, ADSL, and the like.

The suggestion of the EIA/CEG that the Commission delay deployment of digital technologies until standards are established is not warranted, however.¹¹ As a result of the

⁹ H.R. Rep. No. 628, 102d Cong., 2d Sess. 108 (1992).

¹⁰ BellSouth, pp. 3, 8.

¹¹ EIA/CEG, pp. 41-43.

Cable Act and this proceeding, the cable industry is on notice that compatability with consumer equipment will be required and that voluntary or Commission-issued interface standards are likely. If firms choose nevertheless to deploy digital technologies before those standards are finalized, they assume the risk that their systems may be subject to modification. There is no public interest in preventing cable firms from taking such actions. To the contrary, industry experimentation with alternative digital technologies and interfaces while a standard evolves may well provide useful input to the standard-setting effort.

CONCLUSION

For the reasons stated herein, the Commission should permit a group comprised of members of the affected industries to address the issue of standardized digital interfaces for broadband services. Commission action mandating particular standards should only be considered if the voluntary standard-setting process is unsuccessful.

Respectfully submitted,

AMERICAN TELEPHONE AND TELEGRAPH COMPANY

By



Francine J. Berry
Robert L. Dughi
Michael C. Lamb

Its Attorneys

Room 3244J1
295 North Maple Avenue
Basking Ridge, New Jersey 07920

Dated: April 21, 1993

CERTIFICATE OF SERVICE

I, Helen Dalba, hereby certify that a true copy of the foregoing "Reply Comments" was served this 21st day of April 1993 by first-class mail, postage prepaid, upon the parties listed below:

Bruce Franca*
Alan Stillwell
Office of Engineering and
Technology
Federal Communications
Commission
Washington, DC 20554

William B. Barfield
BellSouth
Telecommunications, Inc.
1155 Peachtree St., N.E.
Suite 1800
Atlanta, Georgia 30367-6000

Stephen R. Effros
CATA
3950 Chain Bridge Rd.
P.O. Box 1005
Fairfax, VA 22030-1005

Stephen R. Ross
Ross & Hardies
888 16th St., NW
Washington, D.C. 20006-4103

Dick Glass
ETA
602 N. Jackson St.
Greencastle, IN 46135

Craig J. Blakely
Sidley & Austin
1722 Eye St., NW
Washington, D.C. 20006

Dr. Ron D. Katznelson
Multichannel Communications
Sciences, Inc.
3550 Dunhill St.
San Diego, CA 92121

Brenda L. Fox
Dow, Lohnes & Albertson
1L55 23rd St., NW
Washington, D.C. 20037

Norman M. Sinel
Arnold & Porter
1200 New Hampshire Ave., NW
Washington, D.C. 20036

Gary J. Shapiro
E1A/CEG
2001 Pennsylvania Ave., NW
Washington, D.C. 20006

Floyd S. Keene
Room 4H74
2000 W. Ameritech Center Dr.
Hoffman Estates,
IL 60196-1025

Christopher Ciak
Booth American Co.
P.O. Box 888
Detroit, MI 48231

Joseph Van Loan
Cablevision Industries Corp.
1 Cablevision Center
P.O. Box 311
Liberty, NY 12754

Robert J. Sachs
Continental Cablevision,
Inc.
The Pilot House
Lewis Wharf
Boston, MA 02110

Judith A. McHale
Discovery Communications
7700 Wisconsin Ave.
Bethesda, MD 20814

F. Jack Pluckhahn
One Panasonic Way
Secaucus, NY 07094

Quincy Rogers
General Instrument Corp.
1899 L Street, NW
Suite 500
Washington, DC 20036

Julius Szakolczay
2001 E. Carnegie
Santa Ana, CA 92705

Martin T. McCue
USTA
900 19th St., NW
Washington, DC 20006-2105

Jerry G. Mahn
Fish & Richardson
601 13th St., NW
5th Floor North
Washington, DC 20005

Glenn W. Nohara